



December 7, 2005

Mr. J. Robert Brown
Engineering Services Division
Bureau of Air Quality
2600 Bull Street
Columbia, South Carolina 29201

Re: Bowater Coated and Specialty Papers Division
PSD Permit Application for Kraft Fiberline Optimization
Title V Permit Renewal - Emission Inventory Requests
Permit No. 2440-0005

Dear Mr. Brown:

Bowater Coated and Specialty Papers Division (Bowater) received your verbal requests for revisions to the facility emission inventory submitted with the Title V operating permit renewal application, and emission calculations submitted with the Kraft Fiberline Optimization PSD permit application, to improve consistency among the two inventories. You also requested additional information regarding increases in paper production from the project.

Summary of changes to the Title V inventory are as follows:

- Bleach plant VOC and CO emissions adjusted to account for emission factors being reported in ODTP.
- Precipitator mix tank TRS emissions based on NCASI TB 849.
- Causticizing area PM, VOC, and TRS emissions broken-out by individual sources and adjusted where necessary.
- No. 2 lime kiln VOC emissions corrected for typographical error.

Summary of changes to the PSD emission calculations are as follows:

- Digester relief VOC emissions added to continuous digester blow tank emissions.
- Turpentine recovery system VOC emissions adjusted to account for emission factors being reported as methanol.
- Bleaching system TRS emissions adjusted to account for emission factors being reported as sulfur.
- Evaporator set VOC emissions adjusted to account for emission factors being reported as methanol.
- New 68% black liquor storage tank TRS emissions adjusted to account for emission factors being reported as sulfur.
- No. 3 recovery furnace TRS emissions based on NCASI TB 858.
- No. 3 smelt tank TRS emissions based on NCASI TB 858.

- Causticizing area weak wash pressure filter deleted to eliminate double counting of white liquor pressure filter emissions (as described in NCASI TB 701, Table 17).
- Causticizing area TRS emissions adjusted to account for emission factors being reported as sulfur.
- No. 2 lime kiln TRS emissions based on NCASI TB 858.

Other clarifications to emission calculations:

- PM₁₀ emissions have been assumed to be identical to PM emissions for NSR applicability purposes, however the Title V inventory contains specific emission estimates for PM, PM₁₀, and PM_{2.5} based on EPA and NCASI speciation information.

Paper machine production:

The paper mill consists of three coated paper machines and one market pulp dryer. The baseline actual emissions for 2003-2004 are shown below:

Baseline Actual Paper Production (tons)

YEAR	Pulp Dryer	No. 1 PM	No. 2 PM	No. 3 PM	TOTAL
2003	232,657	131,175	226,262	220,432	810,526
2004	210,168	140,286	225,282	321,811	897,547
Average	221,413	135,731	225,772	271,122	854,037

However, the paper mill is capable of accommodating more paper production than actually produced during the previous two years. The production reasonably accommodated for the paper mill is the sum of the highest annual production for each paper machine and the pulp dryer, except for the No. 3 paper machine. The production reasonably accommodated for the No. 3 paper machine is the highest monthly average production (992 tons/day) since the conversion to coated paper in March 2003.

Reasonably Accommodated Production (tons)

	Pulp Dryer	No. 1 PM	No. 2 PM	No. 3 PM	TOTAL
Maximum	269,394	144,952	236,857	362,080	1,013,283
Year	1999	1999	2002	March 2004	N/A

The pulp production from the bleach plant is expected to increase by 137,390 tons. Adding this amount to the baseline actual paper production of 854,037 tons yields a projected actual paper production of 992,007 tons. This is less than the 1,013,283 tons the paper mill is currently capable of accommodating. Therefore, no emissions increase from the paper mill will occur as a result of the project, since the paper mill is already capable of producing the extra paper.

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The revised Title V inventory has been enclosed on a computer disc. The revised PSD emission calculations are contained in Attachment 1, with changes highlighted as underlined blue text. A revised applicability table is presented in Attachment 2.

If you have additional questions regarding this submittal please contact Jacquelyn Taylor of Bowater at (864) 981-8759, or me at (864) 527-4734.

Sincerely,

Steven R. Moore
URS Corporation

cc: Jacquelyn Taylor – Bowater

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Attachment 1
Revised PSD Emissions Calculations

C.2 Kraft Mill Continuous Digester & Blow Tank (HVLC System)

C.2.2 Volatile Organic Compound (VOC) Emissions (Method 25/25A as C)

Blow Gases emission factor from NCASI TB 884 = 0.71 lb/ADTUP (Pulping & Evaporator)

Methanol emission factors from NCASI TB 858:

$$\text{Evaporator Only} = 0.022 \text{ lb/ADTUP}$$

$$\text{Pulping + Evaporator} = 0.043 \text{ lb/ADTUP}$$

$$\begin{aligned} \text{Blow Gases VOC emission factor} &= 0.71 \text{ lb/ADTUP} \times [(0.043 - 0.022) \div 0.043] \text{ lb/ADTUP} \\ &= 0.35 \text{ lb/ADTUP} \end{aligned}$$

Digester Relief assume VOC = methanol + terpenes

$$\text{Methanol emission factor from NCASI TB 858} = 1.4\text{E-}3 \text{ lb/ADTUP}$$

$$\text{Terpenes emission factor from NCASI TB 858} = 1.2\text{E-}3 \text{ lb/ADTUP}$$

$$\begin{aligned} \text{Digester Relief VOC as C emission factor} &= [1.4\text{E-}3 \text{ lb/ADTUP} \times 12/32] + [1.2\text{E-}3 \times 120/136] \\ &= 1.6\text{E-}3 \text{ lb/ADTUP} \end{aligned}$$

$$\text{TOTAL VOC emission factor} = 0.35 \text{ lb/ADTUP} + 0.0016 \text{ lb/ADTUP} = 0.35 \text{ lb/ADTUP}$$

Combination boiler destruction efficiency = 98%

Baseline actual emissions:

$$1,458 \text{ ADTUP/day} \times 0.35 \text{ lb/ADTP} \times 1 \text{ day/24 hr} \times (1 - 0.98) = 0.43 \text{ lb/hr}$$

$$532,170 \text{ ADTUP/yr} \times 0.35 \text{ lb/ADTP} \times 1 \text{ ton/2,000 lb} \times (1 - 0.98) = 1.86 \text{ tons/yr}$$

Additional reasonably accommodated emissions:

$$335 \text{ ADTUP/day} \times 0.35 \text{ lb/ADTP} \times 1 \text{ day/24 hr} \times (1 - 0.98) = 0.1 \text{ lb/hr}$$

$$122,275 \text{ ADTUP/yr} \times 0.35 \text{ lb/ADTP} \times 1 \text{ ton/2,000 lb} \times (1 - 0.98) = 0.43 \text{ tons/yr}$$

Projected actual emissions:

$$1,825 \text{ ADTUP/day} \times 0.35 \text{ lb/ADTP} \times 1 \text{ day/24 hr} \times (1 - 0.98) = 0.53 \text{ lb/hr}$$

$$666,125 \text{ ADTUP/yr} \times 0.35 \text{ lb/ADTP} \times 1 \text{ ton/2,000 lb} \times (1 - 0.98) = 2.3 \text{ tons/yr}$$

C.3 Kraft Mill Turpentine Recovery System (LVHC System)

C.3.2 Volatile Organic Compound (VOC) Emissions (Method 25/25A as C)

Assume VOC = methanol

Methanol emission factor from NCASI TB 858 = 9.2E-04 lb/ADTUP

VOC as C (25/25A) emission factor = 9.2E-04 lb/ADTP × 12/32 = 3.5E-04 lb/ADTUP

Combination boiler destruction efficiency = 98%

Baseline actual emissions:

1,458 ADTUP/day × 3.5E-04 lb/ADTP × (1 – 0.98) × 1 day/24 hr = 4.3E-4 lb/hr

532,170 ADTUP/yr × 3.5E-04 lb/ADTP × (1 – 0.98) × 1 ton/2,000 lb = 0.0019 ton/yr

Additional reasonably accommodated emissions:

335 ADTUP/day × 3.5E-04 lb/ADTP × (1 – 0.98) × 1 day/24 hr = 9.8E-5 lb/hr

122,275 ADTUP/yr × 3.5E-04 lb/ADTP × (1 – 0.98) × 1 ton/2,000 lb = 0.00043 ton/yr

Projected actual emissions:

1,825 ADTUP/day × 3.5E-04 lb/ADTP × (1 – 0.98) × 1 day/24 hr = 5.3E-4 lb/hr

666,125 ADTUP/yr × 3.5E-04 lb/ADTP × (1 – 0.98) × 1 ton/2,000 lb = 0.0023 ton/yr

D.1 Kraft Mill ECF Bleaching System

D.1.4 Total Reduced Sulfur (TRS) Emissions (as H₂S)

Emission factors from NCASI TB 858 for total TRS (as S) = 2.8E-03 lb/ADTBP

Baseline actual emissions:

$$1,374 \text{ ADTBP/day} \times 2.8\text{E-}03 \text{ lb/ADTBP} \times 1 \text{ day/24 hr} \times \frac{34}{32} = 0.17 \text{ lb/hr}$$

$$501,510 \text{ ADTBP/yr} \times 2.8\text{E-}03 \text{ lb/ADTBP} \times 1 \text{ ton/2,000 lb} \times \frac{34}{32} = 0.75 \text{ ton/yr}$$

Additional reasonably accommodated emissions:

$$365 \text{ ADTBP/day} \times 2.8\text{E-}03 \text{ lb/ADTBP} \times 1 \text{ day/24 hr} \times \frac{34}{32} = 0.045 \text{ lb/hr}$$

$$133,225 \text{ ADTBP/yr} \times 2.8\text{E-}03 \text{ lb/ADTBP} \times 1 \text{ ton/2,000 lb} \times \frac{34}{32} = 0.20 \text{ ton/yr}$$

Projected actual emissions:

$$1,752 \text{ ADTBP/day} \times 2.8\text{E-}03 \text{ lb/ADTBP} \times 1 \text{ day/24 hr} \times \frac{34}{32} = 0.22 \text{ lb/hr}$$

$$639,480 \text{ ADTBP/yr} \times 2.8\text{E-}03 \text{ lb/ADTBP} \times 1 \text{ ton/2,000 lb} \times \frac{34}{32} = 0.95 \text{ ton/yr}$$

E.1 Kraft Mill Evaporator Set No. 1

E.1.2 Volatile Organic Compound (VOC) Emissions (Method 25/25A as C)

Methanol emission factor from 2001 PSD permit application = 0.49 lb/ADTUP (September 1996 stack test)

VOC as C (25/25A) emission factor = $0.49 \text{ lb/ADTP} \times 12/32 = 0.18 \text{ lb/ADTUP}$

Combination boiler destruction efficiency = 98%

Baseline actual emissions:

$408 \text{ ADTUP/day} \times 0.18 \text{ lb/ADTUP} \times (1 - 0.98) \times 1 \text{ day/24 hr} = 0.061 \text{ lb/hr}$

$0.061 \text{ lbs/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = 0.27 \text{ tons/yr}$

Additional reasonably accommodated emissions:

$94 \text{ ADTUP/day} \times 0.18 \text{ lb/ADTUP} \times (1 - 0.98) \times 1 \text{ day/24 hr} = 0.014 \text{ lb/hr}$

$0.014 \text{ lbs/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = 0.061 \text{ tons/yr}$

Projected actual emissions:

$620 \text{ ADTUP/day} \times 0.18 \text{ lb/ADTUP} \times (1 - 0.98) \times 1 \text{ day/24 hr} = 0.093 \text{ lb/hr}$

$0.093 \text{ lbs/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = 0.41 \text{ tons/yr}$

E.2 New 68% Black Liquor Storage Tank

E.2.2 Total Reduced Sulfur (TRS) Emissions (as H₂S)

Emission factor from NCASI TB 849 (as S) = 0.18 lb/hr/tank

Potential emissions:

$$1 \text{ tank} \times 0.18 \text{ lb/hr/tank} \times \frac{34}{32} = \underline{0.19} \text{ lbs/hr}$$

$$\underline{0.19} \text{ lb/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton}/2,000 \text{ lb} = \underline{0.83} \text{ tons/yr}$$

F.1 No. 3 Recovery Furnace

F.1.6 Total Reduced Sulfur (TRS) Emissions (as H₂S)

NCASI TB [858](#) emission factor (as S) = [0.0047](#) lb/TBLS

Baseline actual emissions:

1,613 TBLS/day × [0.0047](#) lb /TBLS × 1 day/24 hr × 34/32 = [0.34](#) lb/hr

[0.34](#) lb/hr × 8,760 hr/yr × 1 ton/2,000 lb = [1.5](#) tons/yr

Additional reasonably accommodated emissions:

203 TBLS/day × [0.0047](#) lb /TBLS × 1 day/24 hr × 34/32 = [0.042](#) lb/hr

[0.042](#) lb/hr × 8,760 hr/yr × 1 ton/2,000 lb = [0.18](#) tons/yr

Projected actual emissions:

2,040 TBLS/day × [0.0047](#) lb/TBLS × 1 day/24 hr × 34/32 = [0.42](#) lb/hr

[0.42](#) lb/hr × 8,760 hr/yr × 1 ton/2,000 lb = [1.8](#) tons/yr

F.2 No. 3 Smelt Dissolving Tank

F.2.5 Total Reduced Sulfur (TRS) Emissions (as H₂S)

NCASI TB [858](#) emission factor (as S) = [0.0069](#) lb/TBLS

Baseline actual emissions:

$$1,613 \text{ TBLS/day} \times \text{0.0069 lb/TBLS} \times 1 \text{ day/24 hr} \times \text{34/32} = \text{0.49 lb/hr}$$
$$\text{0.49 lb/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = \text{2.1 tons/yr}$$

Additional reasonably accommodated emissions:

$$203 \text{ TBLS/day} \times \text{0.0069 lb/TBLS} \times 1 \text{ day/24 hr} \times \text{34/32} = \text{0.062 lb/hr}$$
$$\text{0.062 lb/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = \text{0.27 tons/yr}$$

Projected actual emissions:

$$2,040 \text{ TBLS/day} \times \text{0.0069 lb/TBLS} \times 1 \text{ day/24 hr} \times \text{34/32} = \text{0.62 lb/hr}$$
$$\text{0.62 lb/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = \text{2.7 tons/yr}$$

F.3 No. 3 Precipitator Mix Tank

F.3.2 Total Reduced Sulfur (TRS) Emissions (as H₂S)

NCASI TB 849 emission factor (as S) = 0.00010 lb/TBLS

Baseline actual emissions:

$$1,613 \text{ TBLS/day} \times 0.00010 \text{ lb/TBLS} \times 1 \text{ day/24 hr} \times \frac{34}{32} = 0.0071 \text{ lb/hr}$$
$$0.0071 \text{ lb/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = 0.031 \text{ tons/yr}$$

Additional reasonably accommodated emissions:

$$203 \text{ TBLS/day} \times 0.00010 \text{ lb/TBLS} \times 1 \text{ day/24 hr} \times \frac{34}{32} = 0.00090 \text{ lb/hr}$$
$$0.00090 \text{ lb/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = 0.0039 \text{ tons/yr}$$

Projected actual emissions:

$$2,040 \text{ TBLS/day} \times 0.00010 \text{ lb/TBLS} \times 1 \text{ day/24 hr} \times \frac{34}{32} = 0.0090 \text{ lb/hr}$$
$$0.0090 \text{ lb/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = 0.039 \text{ tons/yr}$$

G.1 Causticizing Area

G.1.2 Volatile Organic Compound (VOC) Emissions (Method 25/25A as C)

Emission factors from NCASI TB 884:

Slaker and Causticizers =	5.7E-2
Lime Mud Precoat Filters =	4.1E-3
Precoat Filter Vacuum Pumps =	1.8E-2
Green Liquor Clarifier =	6.6E-2
Green Liquor Surge Tank =	1.4E-3
Weak Wash Pressure Filter =	7.5E-3
White Liquor Pressure Filter =	5.6E-3
Total Causticizing Area =	<u>1.5E-1</u> lb/ton CaO

Baseline actual emissions:

$$418 \text{ ton CaO/day} \times 0.15 \text{ lb/ton CaO} \times 1 \text{ day/24 hr} = 2.6 \text{ lb/hr}$$
$$2.6 \text{ lb/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = 11.4 \text{ tons/yr}$$

Additional reasonably accommodated emissions:

$$168 \text{ ton CaO/day} \times 0.15 \text{ lb/ton CaO} \times 1 \text{ day/24 hr} = 1.1 \text{ lb/hr}$$
$$1.1 \text{ lb/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = 4.8 \text{ tons/yr}$$

Projected actual emissions:

$$600 \text{ ton CaO/day} \times 0.15 \text{ lb/ton CaO} \times 1 \text{ day/24 hr} = 3.8 \text{ lb/hr}$$
$$3.8 \text{ lb/hr} \times 8,760 \text{ hr/yr} \times 1 \text{ ton/2,000 lb} = 16.6 \text{ tons/yr}$$

G.1.3 Total Reduced Sulfur (TRS) Emissions (as H₂S)

Emission factors from NCASI TB 849 (as S):

Slaker and Causticizers = 1.2E-3

Emission factors from NCASI TB 701 (as S):

Lime Mud Precoat Filters = [1.5E-3](#)

Precoat Filter Vacuum Pumps = [6.3E-4](#)

Green Liquor Clarifier = [4.8E-4](#)

Green Liquor Surge Tank = [4.7E-5](#)

~~Weak Wash Pressure Filter = 0~~

White Liquor Pressure Filter = [2.6E-3](#)

Total Causticizing Area = [6.5E-3](#) lb/ton CaO

Baseline actual emissions:

418 ton CaO/day × [6.5 E-3](#) lb/ton CaO × 1 day/24 hr × [34/32](#) = [0.12](#) lb/hr

[0.12](#) lb/hr × 8,760 hr/yr × 1 ton/2,000 lb = [0.53](#) tons/yr

Additional reasonably accommodated emissions:

168 ton CaO/day × [6.5 E-3](#) lb/ton CaO × 1 day/24 hr × [34/32](#) = [0.048](#) lb/hr

[0.048](#) lb/hr × 8,760 hr/yr × 1 ton/2,000 lb = [0.21](#) tons/yr

Projected actual emissions:

600 ton CaO/day × [6.5 E-3](#) lb/ton CaO × 1 day/24 hr × [34/32](#) = [0.17](#) lb/hr

[0.17](#) lb/hr × 8,760 hr/yr × 1 ton/2,000 lb = [0.74](#) tons/yr

G.2 No. 2 Lime Kiln

G.2.6 Total Reduced Sulfur (TRS) Emissions (as H₂S)

NCASI TB [858](#) emission factor (as S) = [0.047](#) lb/ton CaO

Baseline actual emissions:

418 ton CaO /day × [0.047](#) lb/ ton CaO × 1 day/24 hr × 34/32 = [0.87](#) lb/hr

[0.87](#) lb/hr × 8,760 hr/yr × 1 ton/2,000 lb = [3.8](#) tons/yr

Additional reasonably accommodated emissions:

168 ton CaO /day × [0.047](#) lb/ ton CaO × 1 day/24 hr × 34/32 = [0.35](#) lb/hr

[0.35](#) lb/hr × 8,760 hr/yr × 1 ton/2,000 lb = [1.5](#) tons/yr

Projected actual emissions:

600 ton CaO /day × [0.047](#) lb/ ton CaO × 1 day/24 hr × 34/32 = [1.3](#) lb/hr

[1.3](#) lb/hr × 8,760 hr/yr × 1 ton/2,000 lb = [5.7](#) tons/yr

Table 4.1
New Source Review Applicability

Emission Unit	PM ₁₀	SO ₂	NO _x	CO	VOC	TRS
Baseline Actual Emissions (tpy)						
Kraft Mill Digester Chip Bin	0	-80	0	0	-4.9	0
Kraft Mill Digester and Blow Tank	0	-33	0	0	-1.9	0
Kraft Mill Turpentine Recovery System	0	-0.80	0	0	-0.0019	0
Kraft Mill Pressure Diffusion Washer	0	-19	0	0	-0.69	0
Kraft Mill Knotting and Screening System	0	-23	0	0	-0.87	0
Kraft Mill Oxygen Delignification System	0	-3.1	0	-12	-1.1	0
Kraft Mill Bleaching System	0	0	0	-213	-12	-0.75
Evaporator Set No. 1	0	-122	0	0	-0.27	0
Recovery Furnace No. 3	-175	-65	-442	-368	-26	-1.5
Smelt Dissolving Tank No. 3	-44	-1.5	-5.9	0	-2.9	-2.1
Precipitator Mix Tank No. 3	0	0	0	0	-0.38	-0.031
Causticizing Area	-1.8	0	0	0	-11	-0.53
Lime Kiln No. 2	-24	-25	-162	-9.8	-1.8	-3.8
Total Baseline Actual Emissions	-245	-372	-610	-603	-64	-9
Additional Reasonably Accommodated Emissions (tpy)						
Kraft Mill Digester Chip Bin	0	-18	0	0	-1.1	0
Kraft Mill Digester and Blow Tank	0	-7.5	0	0	-0.43	0
Kraft Mill Turpentine Recovery System	0	-0.2	0	0	-0.00043	0
Kraft Mill Pressure Diffusion Washer	0	-4.4	0	0	-0.15	0
Kraft Mill Knotting and Screening System	0	-8.2	0	0	-0.53	0
Kraft Mill Oxygen Delignification System	0	-0.71	0	-2.8	-0.24	0
Kraft Mill Bleaching System	0	0	0	-49	-2.8	-0.20
Evaporator Set No. 1	0	-28	0	0	-0.061	0
Recovery Furnace No. 3	-22	-8.3	-56	-46	-3.3	-0.18
Smelt Dissolving Tank No. 3	-5.7	-0.18	-0.74	0	-0.4	-0.27
Precipitator Mix Tank No. 3	0	0	0	0	-0.048	-0.0039
Causticizing Area	-0.7	0	0	0	-4.8	-0.21
Lime Kiln No. 2	-9.6	-10	-65	-3.9	-0.70	-1.5
Total Reasonably Accommodated Emissions	-38	-85	-122	-102	-15	-2
Projected Actual Emissions (tpy)						
Kraft Mill Digester Chip Bin	0	100	0	0	6.1	0
Kraft Mill Digester and Blow Tank	0	41	0	0	2.3	0
Kraft Mill Turpentine Recovery System	0	1.0	0	0	0.0023	0
Kraft Mill Pressure Diffusion Washer	0	24	0	0	0.87	0
Kraft Mill Knotting and Screening System	0	28	0	0	1.0	0
Kraft Mill Oxygen Delignification System	0	3.9	0	15	1.3	0
Kraft Mill Bleaching System	0	0	0	267	15	0.95
Evaporator Set No. 1	0	186	0	0	0.41	0
Recovery Furnace No. 3	221	82	561	464	34	1.8
Smelt Dissolving Tank No. 3	56	1.9	7.4	0	3.7	2.7
Precipitator Mix Tank No. 3	0	0	0	0	0.48	0.039
Causticizing Area	2.6	0	0	0	17	0.74
Lime Kiln No. 2	34	36	232	14	2.5	5.7
New 68% Black Liquor Storage Tank*	0	0	0	0	0.48	0.83
New Woodyard Truck Dumper*	1.1	0	0	0	0	0
Total Projected Actual Emissions	315	504	800	760	85	13
Project Summary (tons/yr)						
Total Baseline Actual Emissions	-245	-372	-610	-603	-64	-9
Total Reasonably Accommodated Emissions	-38	-85	-122	-102	-15	-2
Total Projected Actual Emissions	315	504	800	760	85	13
Total for Project	32	47	68	55	6	2
NSR THRESHOLD	15	40	40	100	40	10
IS INCREASE SIGNIFICANT?	Yes	Yes	Yes	No	No	No

Table 4.1 (continued)
New Source Review Applicability

Emission Unit	PM ₁₀	SO ₂	NO _x	CO	VOC	TRS
Five-Year Contemporaneous Emissions (tons/yr)						
TMP Bleaching System (CY)	5.7	38.2	15.1	32.5	11.5	0
No. 3 Recovery Furnace (CX)	12.7	14.9	22.3	8	0.9	1.3
Wet End Starch System (CW)	3.6	12	5.8	33	0.77	0
WWTP Holding Basin Pump #1 (CV)	2.5	2.3	35.3	7.6	2.9	0
WWTP Holding Basin Pump #2 (CU)	3.3	3.1	22.7	10.1	3.8	0
TTP Pump A*** (CU)	1.9	1.8	13.1	5.9	2.2	0
ASB Pump A*** (CU)	1.9	1.8	13.1	5.9	2.2	0
New Fiberline & PM3 Conversion (CO, CP, CQ, CR, CS, CT)	N/A**	-217	N/A**	-589	7	-40
LVHC System and Condensate Stripper (CN)	N/A**	196	N/A**	201	-404	2
Air Make-up Units (CM)	N/A**	0	N/A**	27	2	0
Paper Mill Improvement Project (CL)	N/A**	0	N/A**	0	7	0
Condensate Collection Tank (CK)	N/A**	0	N/A**	0	0	0
Total Contemporaneous	31.6	53.1	127.3	-258.0	-363.8	-36.7
Project Summary (tons/yr)						
Total for Project	32	47	68	55	6	2
Total Contemporaneous	31.6	53.1	127.3	-258.0	-363.8	-36.7
Project + Contemporaneous	64	100	195	-203	-358	-35
NSR THRESHOLD	15	40	40	100	40	10
IS INCREASE SIGNIFICANT?	Yes	Yes	Yes	No	No	No

* New sources, allowable emissions shown.

** Included in PSD permits issued in October 2003, emissions no longer creditable.

*** TTP pump B and ASB pump B removed, emissions from pump A only.

Mr. J. Robert Brown
December 7, 2005
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